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12 AlliedPra Destination Management Las Vegas

13 **IN THE UNITED STATES DISTRICT COURT**
14 **FOR THE DISTRICT OF NEVADA**

15 JACQUELINE ESCOBAR & JOHN aka
16 JACK SILVA,

17 Plaintiffs,

18 v.

19 JEL EVENTS, INC. D/B/A ALLIEDPRA
20 DESTINATION MANAGEMENT LAS
21 VEGAS, BOB GAIL ENTERPRISES, INC.
22 D/B/A BOB GAIL SPECIAL EVENTS LAS
23 VEGAS, MGM GRAND HOTEL, LLC AND
24 MGM RESORTS INTERNATIONAL D/B/A
25 MGM GRAND LAS VEGAS (MGM
26 DEFENDANTS),

27 Defendants.

CASE NO.: 2:13-CV-01917-JCM-CWH

**STIPULATED CONFIDENTIALITY/
PROTECTIVE ORDER**

28 COME NOW, plaintiffs, Jacqueline Escobar and John aka Jack Silva, by and through
their counsel of record, Andre M. Lagomarsino, Esq., of Parker Scheer Lagomarsino, and Frank
Corso, Esq., of Corso Law LLC; defendant, Jel Events, Inc. d/b/a AlliedPra Destination
Management Las Vegas, by and through its counsel of record, Brian K. Terry, Esq., of Thorndal,
Armstrong, Delk, Balkenbush & Eisinger; defendant, Bob Gail Enterprises, Inc. d/b/a Bob Gail

1 Special Events Las Vegas, by and through its counsel of record, James P.C. Silvestri, Esq., of
2 Pyatt Silvestri; and defendants, MGM Grand Hotel, LLC and MGM Resorts International d/b/a
3 MGM Grand Las Vegas, by and through their counsel of record, Jared G. Christensen, Esq., of
4 Bremer Whyte Brown & O'Meara LLP, and hereby enter into this stipulation for a
5 confidentiality and protective order. The parties herein are in agreement that Jel Events, Inc.
6 d/b/a AlliedPra Destination Management Las Vegas and the other parties possess proprietary
7 materials which relate to the instant litigation and include confidential information that may be
8 subject to discovery in the proceedings of this matter, but which should not be made available to
9 the public generally. The materials deemed confidential relate to proprietary matters concerning
10 the process of bidding and organizing a trade convention and all related documents, photographs,
11 etc. As a result thereof, the parties hereby stipulate and allow the court to so order as follows:

14 1. All documents produced or records designated as confidential by Jel Events, Inc.
15 d/b/a AlliedPra Destination Management Las Vegas, or any other party, of whatever nature, will
16 be deemed "confidential" and revealed only to the named parties, counsel of record for those
17 parties in this case, paralegals and secretarial employees under counsels' direct supervision, such
18 persons as are employed by counsel to act as experts in this action.

20 2. Counsel for the parties shall use said "confidential" materials solely in discovery
21 and in litigation for the purposes of preparation for trial and actual trial in this action. Under no
22 circumstances shall documents or materials covered by this protective order be disclosed to
23 anyone other than the named parties, the parties' counsel of record in this action, paralegals,
24 secretarial employees under counsels' direct supervision, and such persons employed to act as
25 experts in this action. This agreement to hold matters "confidential" extends beyond the trial of
26 this matter. At the conclusion of the proceedings in this action, all documents and materials
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1 subject to this order, including any copies or extracts of summaries thereof, or documents
2 containing information taken therefrom, shall be returned to counsel for who produced same,
3 except for documents retained by counsel for record retention purposes under the condition that
4 said documents remain "confidential" under the terms set forth herein. In lieu of returning all
5 materials to counsel,
6
7 the materials may be destroyed with documentation to counsel confirming same.

8 3. Prior to disclosure of any documents covered by this order to paralegals or
9 secretarial employees of counsel, or parties, counsel for the parties shall explain to them the
10 nature and extent of the protective order.

11 4. If counsel determines that for purposes of this action, documents or materials
12 covered by this order must be revealed to a person employed to act as an expert in this action,
13 then counsel may reveal the designated documents or materials to such person after explaining
14 the nature and extent of this order.

15 5. This order is subject to revocation and modification by order of the court upon
16 written stipulation of the parties, or upon motion and reasonable notice, including opportunity for
17 hearing and presentation of evidence.

18 6. Nothing in this order is intended to affect any right any party may have regarding
19 work product or any privilege.

20 7. If any party to this case needs to utilize any record covered by this order in a
21 motion or other document filed with the court, it must comply with the provisions of the Nevada
22 rules for sealing and redacting court records.

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1 Dated this _____ day of _____, 2014.

Dated this 3 day of March, 2014.

2 PARKER SCHEER LAGOMARSINO

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BALKENBUSH & EISINGER

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Hotel, LLC and MGM Resorts
International d/b/a MGM Grand Las Vegas

22 **ORDER ON STIPULATED CONFIDENTIALITY/PROTECTIVE ORDER**

23 IT IS SO ORDERED.

24 DATED this 14th day of March, 2014.

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26 
27 UNITED STATES MAGISTRATE JUDGE
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1 Dated this 12th day of March, 2014.

2 PARKER SCHEER LAGOMARSINO

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23 Enterprises, Inc. d/b/a Bob Gail
24 Special Events Las Vegas

Dated this ___ day of ___, 2014.

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1 Submitted by:

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